

# CLEARY, JOSEM & TRIGIANI

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January 28, 2021

By ecf

Honorable John Michael Vazquez  
United States District Judge  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: UAW Local 259 Social Security Department v. SMG Auto, et. al.  
Case No. 20-12141(JMV)**

Dear Judge Vazquez:

I represent the United Automobile Workers Local 259 Social Security Department, the Plaintiff in the above matter. On January 8, 2021, the Court entered an Order stating that unless Plaintiff moves for default by today's date, the case may be listed for dismissal. (Doc. 8) Per that Order, we filed a Request for Entry of Default with the Clerk last week (Doc. 9) and were preparing a Motion for Default Judgment which we intended to file today.

However, late yesterday the Defendants' attorney sent me a settlement offer. I need to review the offer with my client and my client's auditor. I am therefore requesting a thirty (30) day extension of the deadline for filing our Motion for Default Judgment.

Please let me know if you need any additional information to consider this request. Thank you for your attention to this matter.

Respectfully submitted,

JEREMY E. MEYER

cc: Marylou Gartland (by email)  
Robert Milman, Esquire (by email)